



THE CITY OF NEW YORK
LAW DEPARTMENT

100 CHURCH STREET
NEW YORK, NY 10007

JAMES E. JOHNSON
Corporation Counsel

ALANA R. MILDNER
Labor and Employment Law Division
Phone: (212) 356-1177
Fax: (212) 356-2439
Email: amildner@law.nyc.gov

April 28, 2020

BY ECF

Honorable Vernon S. Broderick
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: Elgalad v. New York City Dept. of Educ. et al.
Civil Action No. 17 Civ. 4849 (VSB)
Law Dept. No.: 2017-036946

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the Office of James E. Johnson, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action.

I write on behalf of all parties to request that fact discovery be extended from April 30, 2020 until July 15, 2020. The parties also request that the post-discovery status conference now scheduled for May 15, 2020 be adjourned to a date convenient for the Court after the close of discovery. This is the first request for an extension of discovery in this matter.

The parties have engaged in substantial document discovery in this matter and document discovery is nearly complete. The extension is primarily sought for depositions, which the COVID-19 crisis prevented from occurring in March and April. The parties make this extension request with the hope that in-person depositions will be feasible in June or July 2020.

We thank the Court for its attention to this matter.

Respectfully Submitted,
/s/
Alana R. Mildner
Assistant Corporation Counsel

cc: **By ECF**
Bryan D. Glass, Esq.
Glass Harlow Hogrogian LLP
Attorneys for Plaintiff
85 Broad Street, 18th Floor
New York, New York 10004